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June 8, 2005

Ms. Mary L. Cottrell Secretary Dept. of Telecommunications & Energy One South Station Boston, MA 02110

Re: Docket No. DTE 04-116 - Investigation into Quality of Service Provided by LDC's

Dear Ms. Cottrell:

This letter provides the response to requests for the information listed below.

Response to DTE-02 Interrogatories dated 05/27/2005 DTE-LDC - 001 , 002 , 003 , 004 , 005

Very truly yours,

Stephen Klionsky

SK/tms

cc: Service List

Information Request DTE-02 Dated: 05/27/2005 Q- DTE-LDC-001 Page 1 of 1

Witness: Michael T. Smith

Request from: Department of Telecommunications and Energy

Question:

Please provide, to the extent such information is available, your LDC's average response time in minutes from the receipt of a report that electrical wires are lying in the road (such as would result from a vehicle collision with a distribution pole or a tree structure failure) to the arrival of a service crew at the scene of the accident.

Response:

WMECO does not currently track response times to down wire calls. WMECO can determine an estimated response time via a manual process of examining the trouble ticket receipt time against the time stamp on the radio communication tapes. This a labor intensive process reserved for investigations into specific events or concerns. WMECO's new outage management system (OMS) does have the capability to input arrival time for future automated reporting. However, the transmission of the arrival time to the System Operations Center (SOC) and input into the system is still a manual process. WMECO has initiated a pilot program to start capturing arrival times and develop response time reporting for future measure. It is important to note this pilot is based on normal, non-storm operations for now.

Information Request DTE-02 Dated: 05/27/2005 Q- DTE-LDC-002 Page 1 of 1

Witness: Michael T. Smith

Request from: Department of Telecommunications and Energy

Question:

Please provide the approximate length of time that is required to de-energize downed wires from the time a Company service crew arrives at the scene of the accident. For purposes of this question, assume that the associated feeder is not remotely controlled.

Response:

WMECO does not currently track the length of time solely required to de-energize downed conductors once a crew arrives at the scene. WMECO assigns all down conductors as a priority. However, many wires down calls are not WMECO infrastructure or conductors. Many of these calls are CATV, Phone or Fire Alarm wires. WMECO will still do its best to make the downed wire safe to protect the public and notify the other utility of the problem. Due to our commitment to the public safety concern, WMECO responds to all downed wire calls even though the wire may not be ours. Once a line (service) crew or line supervisor arrives and determines the conductor is WMECO's infrastructure and that the conductor is energized, the down conductors are de-energized on average within 5 to 10 minutes depending upon the amount of switching required to de-energize the problem area. WMECO does send non-line resources, especially during storms, to assess the situation and determine if the downed conductor is WMECO's. In these cases, the WMECO representative remains on site to keep the public away from the downed conductor until a line (service) crew or line supervisor arrives to make the situation safe by either de-energizing the conductor or implementing our storm cut and clear process.

Information Request DTE-02 Dated: 05/27/2005 Q- DTE-LDC-003 Page 1 of 1

Witness: Michael T. Smith

Request from: Department of Telecommunications and Energy

customers just to meet the downed wires metric.

Question:

Please comment on the feasibility of adopting a service quality performance standard for electric LDCs' response times to downed wire reports, similar to the service quality performance standard for gas distribution company odor response calls.

Response:

The implementation of a service quality performance standard for electric company's wire down responses is not recommended for the following reasons:

Unlike the gas odor calls relationship to gas leaks, wires down calls are not all related to the electric company infrastructure. A majority of gas odor calls are truly related to gas leaks and no other source, therefore dictating the immediate response to the potential safety concern. In the case of downed wires, many events are attributed to non-electric facilities, (i.e. CATV, phone, fiber optic, and/or fire alarm wires). Many customers, especially municipal safety officials, report all downed wires to the electric company to ensure no electrical hazards exist and because they know the electric company will respond as soon as possible to protect the public. This is not always the case with telecom infrastructure companies. Telecommunication wires down don't represent the same public safety risk and usually, unless broken, continue to provide the service the respective utility provides.

A metric for response time would have to take into account the territory served by the distribution company and the fact that driving distances to the more remote areas of the service territory would take significantly more time than the areas closer to work center locations.

During storm events, even after mobilizing additional personnel to check wires down calls, the volume of calls makes it nearly impossible to respond in the same timeframe as to normal non weather events.

If a service quality performance standard for downed wires call was implemented, the electric companies could be dispatching valuable line resources to non-electric downed conductors instead of dispatching the same resources to electric troubles or outages. This could negatively impact the service level of our electric service

WMECO remains fully committed to preserving public safety. Even without a performance standard, WMECO demonstrates this commitment by prioritizing the response to downed wires and responding appropriately. Therefore, a performance standard for downed wires is not necessary to drive excellent response by WMECO.

Information Request DTE-02 Dated: 05/27/2005 Q- DTE-LDC-004 Page 1 of 1

Witness: Michael T. Smith

Request from: Department of Telecommunications and Energy

Question:

Please discuss the feasibility of introducing momentary average interruption frequency index ("MAIFI") as a service quality reporting requirement, phased in over a five-year period such that circuits which are equipped to report MAIFI data are reported in the initial year, with additional circuits added to the annual reporting requirement as they become equipped to report MAIFI data.

Response:

WMECO does not believe that MAIFI should be used as a service quality reporting requirement, whether phased-in or implemented at once. While WMECO could embark on an effort to produce some type of MAIFI report if money was not a concern, it would be far preferable for WMECO to spend its limited resources on distribution line and substation repair and upgrades – actions that directly benefit customers – than to create a new metric that: (1) would produce results of questionable usefulness; and (2) is prohibitively expensive.

WMECO and its affiliates have been aware of the MAIFI metric and have explored some preliminary steps to obtain MAIFI data. These steps have reinforced the conclusion that MAIFI should not be pursued as a reporting requirement. A few years ago, WMECO made attempts to manually calculate MAIFI, utilizing our monthly device operations counts, from breakers at stations and protective devices in the field. This did not prove to be an effective means of obtaining this metric, as it required that the device operations on each device be recorded each month. In this manual process it became difficult to determine whether the device operation was in fact a momentary operation or whether it might have been from a fault or some switching operation. In addition, The Connecticut Light and Power ("CL&P"), a sister company to WMECO, has run a MAIFI test pilot employing automatic meter reading ("AMR") technology. The pilot involved the installation of six AMR meters, two per phase, with phone hook ups, beyond an automatic device to ensure some redundancy for capturing the operations. Unfortunately, the pilot has only reinforced the difficulty of capturing MAIFI as a meaningful metric. Significant difficulty has been encountered in interpreting the data received and determining what it means for customers. In addition, it has become clear that more widespread implementation would be prohibitively expensive. Should WMECO attempt such a pilot or more widespread implementation there is no doubt it would encounter the same problems.

In sum, WMECO's opinion, based on its experience in the field, is that customers' money is better spent on improving customer service than on using this money to create another service quality reporting metric. This is the case whether the metric is phased-in or not. Further, system average interruption frequency index ("SAIFI") is currently being measured and provides a good indication of the frequency with which customers experience outages. WMECO examines monthly device operations and takes action as needed. In addition, WMECO has some initiatives where it measures the number of customers with "5 or more" interruptions both in a rolling 12 month period and also on a year to date basis. From this information, WMECO undertakes initiatives to avoid multiple interruptions to the same customers.

Information Request DTE-02 Dated: 05/27/2005 Q- DTE-LDC-005 Page 1 of 2

Witness: Michael T. Smith

Request from: Department of Telecommunications and Energy

Question:

If the future service quality guidelines were to include conditions for responding to a request for street light repair by customers, please explain:

- (a) in detail how your company tracks street light repair requests from the initial street light out call to its repaired status;
- (b) if and how this time period has changed over the last five years;
- (c) the reasons for any changes in the company's response time to repair street lights and the actual time(s); and
- (d) the difference in time to repair an overhead street light compared to an underground street light.

Response:

WMECO has a solid procedure in place to track reports of streetlights that are out and the follow through to ensure the lights are repaired in a timely manner.

- (a) WMECO has made several improvements to its street light repair process in the past several years. All customer calls for street lights out are received by our Customer Service Center. An electronic repair request is initiated on each light and transferred to the appropriate Area Work Center (AWC) for follow-up. In some cases, the ticket is printed and manually assigned to the crew who will be sent to repair the light. The crew, or troubleshooter, will repair the light, in some cases replace the fixture, or determine that the light cannot be immediately fixed and requires further follow-up work. The paper ticket is returned to the AWC where the ticket is updated and closed out. In the past two years WMECO has initiated a mobile streetlight repair initiative, where the electronic repair request is sent directly to a mobile computer mounted in one of our line vehicles. The line worker visits the location of the reported light out and repairs, replaces, or determines further work is required to fix the light. In this scenario, the line worker enters the resolution into the mobile computer, either resolving the ticket or initiating a request for further work. In some of our AWC's the information is "real time" while others, where there are difficulties communicating with the mobile device, the information must be downloaded when the unit is within communications range of the AWC computer system. WMECO has also initiated pilots in some communities where the local police departments FAX a list of street lights that they discover to be out during their routine patrols. Electronic repair tickets are generated using the FAXed lists and the process listed above is followed to repair the lights. This initiative has been viewed in a positive manner by the towns that participate.
- (b) Over the past five years the average number of days to repair streetlights has remained relatively the same.
- (c) With the introduction of the mobile streetlight repair initiative we have been able to provide real time information on the repair status of streetlights, especially in our most urban areas. It has been more difficult to accomplish streetlight repairs with in three days in the more rural parts of our service territory. For rural streetlights it becomes more cost effective to repair several lights when our crews are in an area than to drive long distances to repair a single light. It takes WMECO approximately three days to repair lights that have been reported out.

(d) The time needed to repair a streetlight fed by an overhead conductor and an underground conductor are virtually the same unless the repair requires work to the underground line. In such cases, the need to excavate the line or portions of the line introduce an additional time element. Also, repairs to underground lines in the winter months often take additional time due to frozen ground and other adverse weather conditions.